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Via ECF

March 1, 2018

Honorable Robert M. Levy, U.S.M.J. United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: Hotaranu et al. v. Star Nissan Inc., et al.

Docket No.: 16-CV-05320 (KAM)(RML)

MLLG File No.: 134-16

Dear Judge Levy:

This firm represents the Defendants in the above-referenced matter and Plaintiffs join in this letter. The parties have reviewed the Court's February 27, 2018 Order concerning a bifurcated settlement structure and respectfully request permission to submit the non-FLSA settlement agreement to the Court via e-mail rather than through ECF. The reason for this request is that the non-FLSA agreement will contain a confidentiality provision with regard to the settlement of the non-FLSA claims. The parties will submit the FLSA settlement agreement along with a motion for approval of the FLSA settlement agreement via ECF as it will not contain a confidentiality provision.

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen

cc: all counsel of record (via ECF)